From: Gnance@TechLawInc.com Sent: 1/25/2012 8:57:00 AM

To: "Fred Foreman" <Foreman.Fred@epamail.epa.gov>

CC:

Subject: RE: Analytical Services for Glycols Analysis

Fred,

Do you know which TestAmerica lab did the work for Cabot? I believe the Houston Lab may be the only one that does all the parameters (except the tetra-). I am trying to search through to find the data in the Cabot data file to determine if they had any detections, concentrations, and reporting limits. R. Rupert is still interested in setting up a Tier IV lab for the glycols.

Gene Nance TechLaw, Inc. 740.867.0968 (office) 304.830.1442 (mobile)

From: Fred Foreman [mailto:Foreman.Fred@epamail.epa.gov]

Sent: Tuesday, January 24, 2012 4:58 PM

To: Richard Rupert

Cc: Burris, Brian; Carter, Joe; Nance, Gene; Kevin Martin; Graves, Suddha; Stevie Wilding

Subject: Re: Analytical Services for Glycols Analysis

Unfortunately, our search came up with the same limited number of resources. Test America did the initial work for Cabot.

Fred Foreman, Chief

Technical Services Branch

Office of Analytical Services & Quality Assurance

US EPA Region III Ft. Meade, Maryland

410-305-2629

From: "Nance, Gene" < Gnance@TechLawInc.com>

To: Richard Rupert/R3/USEPA/US, Fred Foreman/ESC/R3/USEPA/US@EPA

Cc: Stevie Wilding/ESC/R3/USEPA/US, Kevin Martin/ESC/R3/USEPA/US@EPA, "Graves, Suddha" < Sgraves@TechLawInc.com >, "Carter, Joe" < Jcarter@TechLawInc.com >, "Burris, Brian"

<<u>Bburris@TechLawInc.com</u>>
Date: 01/24/2012 04:23 PM

Subject: Analytical Services for Glycols Analysis

Rich, Fred:

I contacted the labs listed below regarding the glycols analysis. The only lab that can do more than 1 or 2 is TestAmerica Houston, which can do all but one. However, they use Method 8015 and their method detection limits (MDLs) are much higher the OASQA's QLs (and RLs would be 5-10 times higher than MDLs). MDLs are as follows:

2-methoxy ethanol - 5 mg/L 2-butoxy ethanol - 1.67 mg/l di-ethylene glycol - 2.99 mg/L tri-ethylene glycol - 3.35 mg/L tetra-ethylene glycol - Do not do

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These results would not be comparable with OASQA results unless the samples have very high concentrations. Let me know if you want me to request a bid quote from them, and if so, how many samples to set up. If we procure these services, it might be advisable to only do this for a limited number of samples that are expected to have high concentrations based on previous sampling.

Below is a list of commercial labs contacted.

Labs Contacted:	Results
Pace Analytical	none of Pace Labs do glycols
APPL	Do not do
Trimatrix	Do not do
Columbia Analytical Services (CAS)	none of CAS Labs do list, they only do 2-butoxy ethanol by 8270
TestAmerica Denver	no response
TestAmerica Houston	They can analyze for all except tetra-ethylene glycol.
6310 Rothway Street, Houston, TX 77040	Tel: 713-690-4444

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